UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING File No. 3-16364

In the Matter of,

DAVID L. MARION,

Respondent.

RESPONDENTS ANSWER TO INITIAL PROCEEDING OF SEC

DAVID L. MARION, above-named Respondent respectfully submits the foregoing Answer to the Order Initiating Administrative Proceedings against him by the SEC.

Respondent admits and denies as follows, putting the SEC to the strict burden of proof.

- 1. As to paragraph I. Respondent is without sufficient facts to admit of deny these allegations.
- 2. As to paragraph II Respondent admits that he is 54 years of age, admits he is in the federal prison camp at Duluth, Minnesota and the remaining facts contained within this paragraph.
 - 3. As to paragraph 1, Respondent admits such facts.
- 4. As to paragraph 2, believes that these facts are at least in part true, denies the remaining.
 - 5. As to paragraphs 3, and 4, Respondent is unable to admit or deny.
 - 6. As to paragraphs III.(A)(B) respondent cannot admit or deny.

Dated: February 10, 2015.

David L. Marion

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 - 6. As to paragraphs III. (A) (B) respondent cannot admit on deep.

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February 14, 2015

Ms. Jill M. Peterson Assistant Secretary Securities and Exchange Commission 100 F Street N.E. Washington, D.C. 20549

RE: In the Matter of David L. Marion File No. 3-16364

Dear Ms. Peterson:

Enclosed herewith as required please find my Answer for filing with your office. Please file this in your usual manner.

Because I do not believe your office can meet its burden of proof as is required by the pertinent statute and controlling case law of **Steadman v. SEC,** 603 F.2d 1126 (5th Cir. 1979).

Please advise me of any Order that may be issued by an Administrative Judge.

Very truly,

Pavid L. Marion

Enclosure

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